

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RAI THOMAS,
a/k/a "Bandz,"

Defendant.

INDICTMENT

23 Cr. 481

COUNT ONE

(Sex Trafficking of a Minor)

The Grand Jury charges:

1. From at least in or about January 2022 through at least in or about February 2022, in the Southern District of New York and elsewhere, RAI THOMAS, a/k/a "Bandz," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did aid and abet the same, *to wit*, THOMAS recruited, enticed, harbored, transported, provided, obtained, maintained, advertised, patronized, and solicited a victim ("Minor Victim-1"), who had attained the age of 14 years but had not attained the age of 18 years, to engage in commercial sex, and benefited financially from such commercial sex.

(Title 18, United States Code, Sections 1591(a) and (b)(2), and 2.)

COUNT TWO

(Use of Interstate Facility to Promote Unlawful Activity)

The Grand Jury further charges:

2. From at least in or about January 2022 through at least in or about February 2022, in the Southern District of New York and elsewhere, RAI THOMAS, a/k/a “Bandz,” the defendant, did travel in interstate and foreign commerce and use and cause to be used the mail and facilities in interstate and foreign commerce, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, *to wit*, THOMAS used a cellular phone and the Internet to promote, manage, establish, and carry on a criminal business engaged in sex trafficking and prostitution, and promoting prostitution in violation of New York Penal Law §§ 230.00, 230.20, 230.25, and 230.30.

(Title 18, United States Code, Sections 1952(a)(3) and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, RAI THOMAS, a/k/a “Bandz,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594 and 2, any and all property, real and personal, that was involved in, used or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and any property, real and personal, constitution or derived from any proceeds obtained, directly or indirectly, as a result of the offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSETS PROVISION

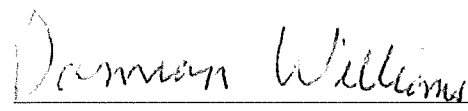
4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1594;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney